

ORIGINAL *2/26*
IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SHIN-EI BOEKI, LTD.

v.

SCOTT KAJIYA, MICHAEL W. BINGHAM,
CARY BRIGGS, SIGN LANGUAGE EYEWEAR,
INC. d/b/a SIGN LANGUAGE HABITAT,
and Si SCOOTER WORKS, INC.

CIVIL ACTION

NO. 1:00-cv-02241

(Judge Kane)

FILED
HARRISBURG, PA

Mas J. [Signature] APR 28 2003

MARY E. O'ANDREA, CLERK
[Signature]

**PLAINTIFF'S MOTION TO DISMISS ALL CLAIMS AND
COUNTERCLAIMS PURSUANT TO FED.R.CIV.P. 41(a)(2)**

Plaintiff Shin-Ei-Boeki, LLC, by and through its undersigned attorneys, hereby moves this Honorable Court for an Order pursuant to Fed.R.Civ.P. 41(a)(2) dismissing all claims and counterclaims, and in support thereof plaintiff will rely on the annexed brief.

Respectfully submitted,

SILVERMAN BERNHEIM & VOGEL

By: *[Signature]*

JONATHAN S. ZISS

P.A.I.D. 42437

Attorneys for plaintiff
Shin-Ei Boeki, Ltd.

Two Penn Center Plaza
Suite 910
Philadelphia, PA 19102
(215) 569-0000

CERTIFICATE OF SERVICE

I, Jonathan S. Ziss, hereby certify that on April 24, 2003 I caused a true and correct copy of the foregoing Motion of Plaintiff Shin-Ei-Boeki, Ltd. Pursuant to Fed.R.Civ.P. 41(a)(2) to Dismiss All Claims, Counterclaims and Crossclaims with accompanying Memorandum of Law to be served, via United States first-class mail, postage prepared addressed as follows:

Michael J. Hanft, Esquire
19 Brookwood Avenue, Suite 106
Carlisle, PA 17013-9142
Attorney for defendant Scott Kajiya

Sign Language Eyewear, Inc. d/b/a Sign Language Habitat
1820 West 220th
Torrance, CA 90501

S. Cary Briggs
550 Erlen Drive
York, PA 17402

Si Scooter Works, Inc. c/o S. Cary Briggs
550 Erlen Drive
York, PA 17402

Michael W. Bingham
130 Ridgefield Drive
York, PA 17403

SILVERMAN BERNHEIM & VOGEL

BY: 

Jonathan S. Ziss, Esquire
Two Penn Center Plaza
Suite 910
Philadelphia, PA 19102
(215) 569-0000